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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:____ DATE FILED: 10/09/2020___

October 9, 2020

BY ECF:

Hon. John P. Cronan United States District Court Southern District of New York Danial Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

Re: Travelers Property Casualty Company of America v. Harleysville Insurance

Company

Case Number: 20-cv-6689 (JPC) Our Matter Number: 2020072713

Dear Judge Cronan:

This firm represents the plaintiff, Travelers Property Casualty Company of America ("Travelers"), in the above referenced matter. I write to request an adjournment of the Initial Status Conference in this matter, currently scheduled for October 16, 2020, until November 16, 2020, or to such other date thereafter as is convenient for the Court, with the joint letter and proposed case management plan and scheduling order to be submitted one week before the adjourned Initial Status Conference date.

The reason for this request is that Defendant Harleysville Insurance Company ("Harleysville") has not yet appeared in this matter, and its time to answer or otherwise respond to the Complaint will not yet have passed by October 16, 2020. Travelers believes it will not be practicable to produce a joint letter and proposed case management plan and scheduling order, and to have a productive Initial Status Conference, before Harleysville has appeared.

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company And its Property Casualty Affiliates

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Travelers has made no previous request for the relief requested in this letter. Travelers has not sought consent from opposing counsel for the relief requested in this letter because no counsel has yet appeared in this matter for Harleysville.

Respectfully,

/s/ Amy C. Gross

Amy C. Gross

The Initial Status Conference scheduled for October 16, 2020, at 4:30 p.m. is hereby adjourned to November 9, 2020, at 3:00 p.m.

SO ORDERED.

Date: October 9, 2020

New York, New York

JOHN P. CRONAN United States District Judge

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